

1 Jeffrey D. Olster
Nevada Bar No. 8864
2 Jeff.Olster@lewisbrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
3 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
4 Tel: (702) 893-3383
Fax: (702) 893-3789
5 *Attorneys for Defendants*
PATENAUDE & FELIX APC, RAYMOND A.
6 *PATENAUDE, MICHAEL D. KAHN and*
ANGIE HONG HOAR
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 TROY CAPITAL, LLC, a Nevada Limited
Liability Company,

12 Plaintiff,

13 vs.

14 PATENAUDE & FELIX APC, *et al.*,

15 Defendants.
16

Case No. 2:20-cv-00205-JCM-DJA

**STIPULATION TO EXTEND DEADLINE
FOR DEFENDANTS TO FILE REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

(First Request)

17 PATENAUDE & FELIX APC,

18 Counterclaimant/Third-Party
Plaintiff

19 vs.
20

21 TROY CAPITAL, LLC, a Nevada Limited
Liability Company; RANCE WILLEY, an
Individual, and TROY DUPUIS, an
22 Individual,

23 Counter-defendant/Third-
Party Defendants
24

25 Pursuant to LR IA 6-1 and LR 7-1, the parties, through their respective counsel, stipulate
26 to extend the time for Defendants to file their reply to Plaintiff's Opposition to Defendants' Motion
27 for Summary Judgment (ECF No. 127) by fourteen (14) days, or to June 17, 2022.
28

1 1. On March 4, 2022, Defendants' Motion for Summary Judgment (ECF No. 127)
2 was filed.

3 2. Due to numerous discovery issues, including issues were the subject of
4 Defendants' Motion to Compel (ECF Nos. 107, 131), as well as continuing deposition scheduling
5 issues, the parties agreed to extend the time for Plaintiff to respond to Defendants' Motion for
6 Summary Judgment by approximately forty eight (48) days, or to May 13, 2022 (ECF No. 135, ¶
7 6).

8 3. On May 13, 2022, Plaintiff's Opposition to Defendants' Motion for Summary
9 Judgment was filed (ECF No. 139). This Opposition includes over five hundred (500) pages of
10 exhibits.

11 4. The current deadline for Defendants to file their reply to Plaintiff's Opposition is
12 June 3, 2022 (ECF No. 135, ¶ 6). Due the parties' continuing discovery and deposition scheduling
13 issues, and as a reciprocal courtesy, the parties agree that Defendants shall have an additional
14 fourteen (14) days, or until June 17, 2022, to file their reply to Plaintiff's Opposition.¹

15 5. This requested extension of time is not sought for delay or any other improper
16 purpose. The parties respectfully submit that the reasons set forth above constitute good cause for
17 the extension.

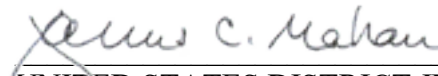
18 DATED this 24th day of May, 2022

IT IS SO ORDERED:

19 LEWIS BRISBOIS BISGAARD &
20 SMITH LLP

21 /s/ Jeffrey D. Olster

Jeffrey D. Olster
Nevada Bar No. 8864
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants
PATENAUDE & FELIX APC,
RAYMOND A. PATENAUDE,
MICHAEL D. KAHN and ANGIE
HONG HOAR


UNITED STATES DISTRICT JUDGE

DATED: May 27, 2022

27 ¹ This new proposed deadline does not require any extension to the operative scheduling order, which
28 provides for a discovery cutoff date of July 18, 2022 and a dispositive motion deadline of August 17, 2022.
(ECF No. 138).

1 DATED this 24th day of May, 2022

2 RELIEF LAWYERS, LLC

3 /s/ Dale K. Kleven

4 Dale K. Kleven
5 Nevada Bar No. 7778
6 Thomas M. Fronczek
7 Nevada Bar, No. 11380
8 5550 Painted Mirage Road, Suite 320
9 Las Vegas, Nevada 89149
10 *Attorneys for Plaintiff/Counterdefendant*
11 *TROY CAPITAL, LLC and Third-Party*
12 *Defendants RANCE WILLEY and TROY*
13 *DUPUIS*

14 DATED this 24th day of May, 2022

15 PATENAUDE & FELIX APC

16 /s/ Joseph DiNoia

17 Joseph DiNoia
18 Nevada Bar No. 11951
19 7271 West Charleston Boulevard, Suite
20 100
21 Las Vegas, Nevada 89117
22 *Attorneys for*
23 *Counterclaimant/Third-Party Plaintiff*
24 *PATENAUDE & FELIX APC*

DATED this 24th day of May, 2022

SIMMONDS & NARITA LLP

/s/ Tomio B. Narita

Tomio B. Narita
R. Travis Campbell
(Admitted *pro hac vice*)
44 Montgomery Street, Suite 3010
San Francisco, California 94104
Attorneys for Plaintiff/Counterdefendant
TROY CAPITAL, LLC and Third-Party Defendants
RANCE WILLEY and TROY DUPUIS

DATED this 24th day of May, 2022

SANTORO WHITMIRE

/s/ Jason D. Smith

Nicholas J. Santoro
Nevada Bar No. 0532
Jason D. Smith
Nevada Bar No. 9691
10100 W. Charleston Boulevard, Suite 250
Las Vegas, Nevada 89135
Attorneys for
Counterclaimant/Third-Party Plaintiff
PATENAUDE & FELIX APC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of May, 2022, service of the foregoing **STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS TO FILE REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** was made upon each party in the case who is registered as an electronic case filing user with the Clerk, pursuant to Fed. Rule Civ. P. 5(b)(3), and Local Rule 5-4, as follows:

| <i>Attorney</i> | <i>Party</i> | <i>Phone/Fax</i> |
|---|--|--|
| Dale K. Kleven Thomas M. Fronczek RELIEF LAWYERS LLC 5550 Painted Mirage Road, Suite 320 Las Vegas, Nevada 89149 Email: dale@relieflawyersnv.com toby@relieflawyersnv.com | <i>Attorneys for Plaintiff, Counterdefendant and Third- Party Defendants</i> | P: (702) 589-7520 F: (702) 577-1075 |
| Tomio B. Narita (Admitted <i>pro hac vice</i>) Travis Campbell (Admitted <i>pro hac vice</i>) SIMMONDS & NARITA LLP 44 Montgomery Street, Suite 3010 San Francisco, California 94104 Email: tnarita@snllp.com tcampbell@snllp.com | <i>Attorneys for Plaintiff/Counterdefendant Troy Capital, LLC and Third- Party Defendants Rance Willey and Troy Dupuis</i> | P: (415) 283-1000 |
| Joseph DiNoia PATENAUDE & FELIX, A.P.C. 7271 West Charleston Boulevard Suite 100 Las Vegas, Nevada 89117 Email: Joseph.DiNoia@pandf.us | <i>Attorneys for Counterclaimant and Third- Party Plaintiff Patenaude & Felix APC</i> | P: (702) 952-2031 F: (702) 382-1512 |
| Nicholas J. Santoro Jason D. Smith SANTORO WHITMIRE 10100 W. Charleston Boulevard, Suite 250 Las Vegas, Nevada 89135 Email: nsantoro@santoronevada.com jsmith@santoronevada.com | <i>Attorneys for Counterclaimant/Third-Party Plaintiff Patenaude & Felix APC</i> | P: (702) 948-8771 F: (702) 948-8773 |

By /s/ Susan Awe
An Employee of
LEWIS BRISBOIS BISGAARD & SMITH LLP